

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA  
THIRD DIVISION

In re:

Paul David Roemhildt  
Michele Lee Roemhildt,

Debtors.

Bankruptcy No. 24-32480

Chapter 7

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Michele Lee Roemhildt,

Plaintiff,

v.

United States Department of Education,

Defendant.

Adversary No. 25-03020

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**SECOND STIPULATION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE RESPOND**

The parties, Debtor/Plaintiff Michele Lee Roemhildt (“Plaintiff”) and Defendant United States Department of Education (“Defendant”) (collectively, the “Parties”), by and through their respective counsel, have entered into this stipulation for an extension of time to answer or otherwise respond (the “Stipulation”). The terms of the Stipulation are as follows:

1. The Adversary Complaint (ECF No. 1) in this matter was filed on February 19, 2025, and the Summons (ECF No. 2) was issued on February 20, 2025.

2. In November 2022, the Department of Justice (“DOJ”) issued new guidance and procedures for litigating student loan adversary cases. The new DOJ guidance encourages U.S. Attorney’s Offices to request that debtors complete a 15-page Attestation in Support of Request for Stipulation Conceding Dischargeability of Student Loans (the “Attestation Form”) so that the Government can assess its position on agreeing to an “undue hardship” discharge under 11 U.S.C. § 523(a)(8) based on debtors’ current and future financial condition. This guidance, which recommends that debtors complete the Attestation Form before answers are filed in commenced

adversary proceedings, is aimed at increasing consistency and litigation efficiency.

3. The Department of Education is gathering relevant documents regarding Ms. Roemhildt's student loans, and she is in the process of completing the attestation form. The parties are working diligently to move through the attestation process.

4. The Parties require an additional thirty (30) days from the date the Court approves this Stipulation to allow sufficient time for the Plaintiff to complete the Attestation Form and for the Defendant to evaluate the Plaintiff's completed Attestation Form to determine the Government's position on discharge.

5. Pursuant to Local Rule 9011-1(b)(3), the Parties' respective counsel authorize the filing of this document with their respective electronic signatures.

Dated: March 27, 2025

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s/ Jeffrey H. Butwinick

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Dated: March 27, 2025

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**United States Department of Education**